

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-- against --

**JOSEPH M. LAURA,
ANTHONY R. SICHENZIO, and
WALTER GIL DE RUBIO,**

Defendants.

18 Civ. 5075 (HG)(VMS)

ECF Case

SUPPLEMENTAL DECLARATION OF NEIL HENDELMAN

I, Neil Hendelman, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age and am employed as a Supervisory Staff Accountant in the Investigations Unit of the Division of Enforcement at the New York Regional Office of Plaintiff Securities and Exchange Commission (“Commission”). I have been employed by the Commission since June 2001. My duties include, but are not limited to, assisting in the investigation of possible violations of the federal securities laws.

2. I make this Supplemental Declaration in further support of the Commission’s Motion for Monetary Remedies Against Defendants Joseph M. Laura and Anthony R. Sichenzio.

3. I am familiar with the facts and circumstances herein. I make this Declaration based upon, among other things, my review and analysis of bank records produced by financial institutions holding accounts in the name of Joseph M. Laura (“Laura”), the law firm of Laura & Matarrese (“Laura & Matarrese”), Anthony R. Sichenzio (“Sichenzio”), Innovative Crude Technologies (“ICT”), and Pristec America Inc. (“PAI”).

4. The bank records I reviewed and analyzed are exhibits to the March 18, 2022 Declaration (“March 2022 Declaration”) (DE 149) I provided in support of the Commission’s Motion for Summary Judgment, and to the November 17, 2023 Declaration (DE 178) I provided in support of the Commission’s Motion for Monetary Remedies (“November 2023 Declaration”), as described in Paragraphs 23-25 to the November 23 Declaration.

5. As relevant, the matters described below are substantially similar or the same as my March 2022 Declaration and my November 2023 Declaration.

Transfers to Richard Sichenzio

6. Attached hereto as Supplemental Exhibit A is a chart that I prepared totaling the net debits from and credits to PAI Accounts and ICT Accounts (the “Pristec Companies’ Accounts”) concerning Richard Sichenzio (the “Richard Sichenzio Transfers”), using the process I described in Paragraph 6 of my November 2023 Declaration. As reflected in Exhibit A, Richard Sichenzio received a total of \$124,600.00 from the Pristec Companies’ Accounts.

7. Supplemental Exhibit A does not include payments from Richard A. Sichenzio or Richard J. Sichenzio to the Laura & Matarrese Account in 2010 as discussed in Paragraph 11 of the Declaration of Margaret D. Spillane. These payments are included in Exhibit C to my November 2023 Declaration (DE 178-3).

8. As described in Paragraph 25(a) to my November 2023 Declaration, Exhibits G and H to the November 2023 Declaration, concerning credits and debits related to Anthony Sichenzio, did not include sums sent to accounts in the name of Richard J. Sichenzio.

9. I have also reviewed the remaining Exhibits attached to my November 2023 Declaration that I prepared totaling the transfers between the Pristec Companies’ Accounts and certain persons and/or classifications identified for me by lawyers for the Commission. I

confirmed that these Exhibits also did not include the transfers between the ICT and PAI Accounts and Richard Sichenzio that are included in Exhibit A to this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 26, 2024, New York, New York.

Neil Hendelman

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